

FILED ENTERED Magistrate Judge Mary Alice Theiler  
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NOV 27 2023

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

GEORGE RAMIREZ,  
Defendant.

CASE NO. MJ23-566

COMPLAINT for VIOLATION

Title 8, United States Code,  
Section 1324(a)(1)(A)(ii)

BEFORE, MARY ALICE THEILER, United States Magistrate Judge, United  
States Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Illegal Transportation of an Alien, Private Financial Gain)**

On or about November 26, 2023, in Whatcom County, within the Western  
District of Washington, GEORGE RAMIREZ, did knowing and in reckless disregard of  
the fact that certain aliens, H.S. and K.S., had come to, entered and remained in the  
United States in violation of law, did transport and move and attempt to transport and  
move said aliens within the United States by means of transportation and otherwise in

1 furtherance of such violation of law to help H.S. and K.S. remain in the United States,  
2 and did so for private financial gain, and did aid and abet the same.  
3

4 All in violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii) and (B)(i)  
5 and Title 18, United States Code, Section 2.

6 The complainant states that this Complaint is based on the following information:

7 I, Jordan Dolan, being first duly sworn on oath, depose and say:

8 **AFFIANT BACKGROUND**

9 1. I am an “investigative or law enforcement officer of the United States”  
10 within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of  
11 the United States who is empowered by law to conduct investigations of, and to make  
12 arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

13 2. I, Jordan Dolan, am a Special Agent (SA) with the United States  
14 Department of Homeland Security (DHS), Immigration and Customs Enforcement  
15 (“ICE”), Homeland Security Investigations (“HSI”), and have been so employed since  
16 August 2016. I am currently assigned to the Group 1 at the Office of the Assistant  
17 Special Agent in Charge (ASAC) in Blaine, WA and have been assigned to that duty  
18 station since November, 2020. My responsibilities include the investigation of federal  
19 criminal laws, including financial crimes such as wire fraud, money laundering,  
20 intellectual property rights violations, smuggling or importation of counterfeit goods,  
21 alien smuggling, and human trafficking.

22 3. I have completed the Criminal Investigator Training Program at the Federal  
23 Law Enforcement Training Center in Glynco, Georgia, which included training in the  
24 investigation of various crimes. During my employment with HSI, I have conducted  
25 criminal investigations relating wire fraud, money laundering, narcotics smuggling,  
26 violations of Intellectual Property Rights, and Child Exploitation Investigations, as well  
27 as numerous interviews of defendants, witnesses and victims. I have also written  
28

1 affidavits in support of complaints, and executed numerous federal arrests, both as part of  
2 my own investigations and assisting in other investigations.

3 4. The information set forth in this affidavit is based upon my own  
4 investigation, the investigation conducted by others, and the details related to me by  
5 others familiar with this matter. Because this affidavit is made for the limited purpose of  
6 establishing probable cause, I have not listed each and every fact known to me  
7 concerning this investigation. I have set forth only the facts that I believe are necessary  
8 to establish probable cause to believe that GEORGE RAMIREZ committed the  
9 aforementioned crime.

#### 10 PROBABLE CAUSE

11 5. On November 26, 2023, Border Patrol Agent (BPA) Steven Robinson was  
12 performing line watch duties along the United States and Canada border, in and around  
13 the city limits of Sumas, Washington. Line watch is a blanket term used by agents when  
14 referring to their patrol duties. Those duties include responding to sensor activity,  
15 looking for signs of cross border entries, checking known crossing locations and  
16 remaining highly visible to deter illegal entries. BPA Robinson was operating the Mobile  
17 Video Surveillance System (MVSS). Most MVSS are capable of monitoring movement  
18 through advanced camera applications.

19 6. At approximately 12:20 a.m., BPA Robinson advised agents using his  
20 vehicle radio that he saw two subjects in Canada getting out of a vehicle that stopped on  
21 the border road which runs adjacent to the U.S./Canada International Boundary.

22 7. BPA Robinson continued to report on the movement of the two subjects as  
23 they crossed from Canada into the U.S. at a location not designated as a U.S. Port of  
24 Entry and without being inspected. The subjects ran south after crossing the border to an  
25 area which contained farm equipment at the north end of Hammer Road. BPA Robinson  
26 was unable to see the subjects after they entered the equipment yard.

1 8. Approximately 30 minutes prior to the subjects crossing the border near the  
2 area containing farm equipment, BPA Robinson advised agents that a pickup truck  
3 parked near the same farm equipment.

4 9. BPA Robinson advised agents that shortly after the subjects entered the  
5 equipment yard, within approximately 3 minutes, he observed a truck exit the property  
6 and continue driving south on Hammer Road towards Halvestick Road. I know from  
7 fellow law enforcement officers that Hammer Road is a highly utilized route to smuggle  
8 undocumented aliens into the U.S. due to its close proximity to the U.S./Canada Border.

9 10. BPA Lindsay conducted a vehicle stop of the truck (subject vehicle) on  
10 Hammer Road before it reached Halvestick Road and approached the vehicle to conduct  
11 an immigration inspection. BPA Lindsay identified himself as a Border Patrol Agent and  
12 questioned the occupants of the subject vehicle as to their citizenship and whether they  
13 were in possession of immigration documents to be, remain, or work in the U.S. legally.  
14 The driver, later identified as David Manthey, and front passenger, Paige Fountaine,  
15 stated they were citizens of the United States.

16 11. BPA Lindsay identified three occupants in the rear seat of the subject  
17 vehicle: left rear passenger, George RAMIREZ; middle rear passenger, H. S. and right  
18 rear passenger K. S. RAMIREZ stated he was a United States citizen. H. S. and K. S.  
19 stated they were citizens of India and not in possession of documents to be, remain, or  
20 work in the United States legally.

21 12. The occupants of the subject vehicle were transported to the Sumas Border  
22 Patrol Station ("Sumas Station") for further investigation and processing. Following  
23 transportation of the vehicle occupants to Sumas Station, BPAs Noblitt and Robinson  
24 conducted an inventory of the subject vehicle. While BPA Robinson was searching the  
25 rear driver's side of the vehicle, he discovered a loaded handgun underneath the left rear  
26 passenger seat. This was the seat in which George RAMIREZ was seated.

27 13. The handgun was identified as a Lorcin L25, .25 caliber, bearing serial  
28 number 146031. The handgun was seized and processed as evidence. Six rounds of .25

1 caliber ammunition were also found inside the pistol's magazine and seized and  
2 processed as well.

3 14. Upon arrival at the Sumas Station, I and BPA Calvin Moss conducted an  
4 interview of K. S. approximately 5:35 a.m. Agents used a Punjabi interpreter obtained  
5 through the Ad Astra language line to interpret in the Punjabi language. The interpreter  
6 I.D. # was 30684. This interview was video and audio recorded.

7 15. Prior to questioning K. S. as to his involvement in criminal activity, SA  
8 Dolan read K. S. his *Miranda* rights. K. S. stated he understood his rights and was willing  
9 to answer questions without the presence of an attorney.

10 16. K. S. stated he arrived at the U.S./Canada International Boundary earlier  
11 that night with H. S. in a taxi. K. S. stated he planned with H. S. to cross illegally into the  
12 U.S. without being inspected and that H. S. had coordinated with someone over the phone  
13 to facilitate their entry and travel into the U.S. in violation of law. K. S. stated H. S. had  
14 told him that a car would pick them up once they entered the United States.

15 17. K. S. stated he and H. S. entered the United States and ran south along a  
16 road until they reached the subject vehicle. K. S. stated that upon arrival at the subject  
17 vehicle, a man, later identified as RAMIREZ, was standing outside the truck. K. S.  
18 identified RAMIREZ as this man from a photographic lineup. K. S. also accompanied  
19 agents to RAMIREZ's holding cell at Sumas Station where RAMIREZ was being held  
20 alone. When K. S. saw RAMIREZ in-person, he indicated this was the same person who  
21 he identified in the photographic lineup.

22 18. K. S. stated when he and H. S. reached the subject vehicle, they both got  
23 into the subject vehicle and the subject vehicle left the area and drove until they were  
24 stopped by the Border Patrol.

25 19. At approximately 11:27 a.m., I and BPA Engels interviewed K. S. again  
26 using the Ad Astra language line to interpret in the Punjabi language. The interpreter I.D.  
27 # was 30684. This interview was audio and video recorded.

1        20. K. S. stated his family had made the arrangements for him to travel from  
2 India into Canada, then into the United States. K. S. did not know who his family used or  
3 contacted for the arrangements, however, he was aware his family would pay \$1,500  
4 dollars when he arrived at his destination.

5        21. K. S. stated H. S. contacted the U.S person and received all the information  
6 and location to get into the United States.

7        22. K. S. stated his understanding was that he and H. S. would be dropped off  
8 somewhere safe. They would then get a taxi to their destination. K. S. was able to identify  
9 subject number 3 (RAMIREZ) in a photographic lineup as the contact with whom, his  
10 friend, H. S. was communicating.

11        23. At approximately 6:45 a.m., I and BPA Moss interviewed H. S. using the  
12 Ad Astra language line to interpret in the Punjabi language. The interpreter I.D. # was  
13 10168. This interview was video and audio recorded.

14        24. Prior to questioning H. S. as to his involvement in criminal activity, H.S.  
15 was provided his *Miranda* rights. During the interview, H. S. corroborated K. S.  
16 statements about taking an Uber/taxi to the U.S./Canada International Boundary and  
17 entering the U.S. illegally without being inspected.

18        25. H. S. stated he coordinated with a travel agent in India to arrange his illegal  
19 entry into the United States. H. S. stated he was given a phone number to call to  
20 coordinate his transportation into the U.S. H. S. stated he had several calls with both  
21 before and after he crossed the border.

22        26. H. S. stated after he and K. S. entered the United States, they ran for  
23 approximately 45-50 seconds to some buildings. H. S. was able to identify subject  
24 number 3 (RAMIREZ) in a photographic lineup as the person who was standing on the  
25 outside of the subject vehicle when they arrived.

26        27. At approximately 11:14 a.m., I and BPA Engel interviewed H. S. again  
27 using the Ad Astra language line to interpret in the Punjabi language. The interpreter I.D.  
28 # was 30684. The interview was audio and video recorded.



28. During the interview, H. S. restated that he used an Indian travel agent to travel from India into Canada, then into the United States illegally because this travel agent had a United States contact.

29. H. S. received the phone number for his U.S. contact whom he was supposed to call upon his arrival at the U.S border to be picked-up. H. S. stated he would be paying the travel agent \$1,500 dollars upon arrival to his destination which would be paid by his family at home in India.

30. H. S. stated upon arrival to the U.S/Canadian border, he called the U.S contact number and was sent a map with directions of where to go to be picked up. H. S. stated the U.S. contact was only going to drive him and K. S. approximately 5 to 6 kilometers. H. S. stated after that they would get a taxi to their next destination or go to a restaurant.

31. H. S. stated he did not have any other conversations with the contact as the police showed up. H.S. identified the U.S contact through a photographic lineup and selected RAMIREZ as his U.S. contact, initialing next to the photo selected. H. S. signed a consent form allowing access to his personal cell phone an iPhone SE.

32. A review of H. S.'s cell phone showed a conversation on H. S.'s WhatsApp account between his account and telephone number 360-599-4862. In these messages H. S. was given a time and location to meet the sender along with a map of the area. H. S.'s WhatApp account also showed several voice calls occurred with 360-599-4862.

33. Manthey, the driver of the vehicle, signed a consent form to search his phone. During the search, agents discovered a phone contact named George with phone number 360-599-4862.

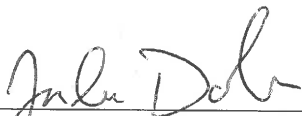
34. Both Manthey and front passenger, Fontaine were interviewed by law enforcement. Manthey and Fontaine were provided their *Miranda* warnings. According to Manthy, RAMIREZ asked him to drive RAMIREZ to the border, but Manthey denied knowing the reason or purpose behind the trip. Manthey stated he, RAMIREZ and Fontaine left together from a residence and drove directly to the border area. Fontaine

1 stated that she and Manthey went to a casino, then picked up RAMIREZ and drove to the  
2 border area. Fountaine also denied knowing the purpose of their travel to the border.

3 35. Based on the communications between H. S. and phone number 360-599-  
4 4862, and a review of Manthey's cell phone showing the same phone number to be saved  
5 under the name George, your affiant believes this phone number was used by GEORGE  
6 RAMIREZ to coordinate the smuggling of K. S. and H. S. across the U.S./Canada border  
7 into the United States. RAMIREZ did not make a statement to law enforcement.

8 36. Law enforcement is in possession of RAMIREZ's cell phone, however at  
9 this time a search has not been conducted.

10 37. Based on the foregoing facts, I submit that there is probable cause to  
11 believe that GEORGE RAMIREZ committed the aforementioned crime.

12  
13   
14 Jordan Dolan, Complainant  
15 Special Agent  
16 Homeland Security Investigations

17 The above-named agent provided a sworn statement to the truth of the foregoing  
18 Complaint and Affidavit in my presence. Based on the contents of this Affidavit, the  
19 Court hereby finds that there is probable cause to believe the Defendant committed the  
20 offense set forth in the Complaint.

21 Dated this 27th day of November, 2023.

22  
23   
24 MARY ALICE THEILER  
25 United States Magistrate Judge  
26  
27  
28